

THE HONORABLE THOMAS S. ZILLY

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON**

PROJECT VERITAS,

Plaintiff,

v.

THE LELAND STANFORD JUNIOR  
UNIVERSITY, and THE UNIVERSITY OF  
WASHINGTON

Defendants.

No. 2:21-cv-01326-TSZ

**PLAINTIFF'S UNOPPOSED MOTION  
FOR ORDER GRANTING  
SUPERSEDEAS BOND AND STAYING  
EXECUTION OF JUDGMENT  
PENDING DISPOSITION OF APPEAL**

**Clerk's Action Required**

**Note Motion on Calendar:  
August 24, 2022**

Plaintiff Project Veritas moves this Court, pursuant to Federal Rule of Civil Procedure 62, Federal Rules of Appellate Procedure 7 and 8, and Local Civil Rule 67 for an order granting bond to stay execution of the judgment in this case pending disposition on appeal. In support of this motion, Veritas states as follows:

1. On August 4, 2022, this Court entered an order awarding Stanford \$149,596.90 in attorney's fees (ECF No. 70). The following day, the Court entered judgment for Stanford in that amount (ECF No. 71).
2. Veritas anticipates appealing that judgment, including the award of attorney's fees to Stanford.
3. Consistent with the applicable Federal and Local Rules, Veritas is prepared to deposit \$164,556.59 into the Registry of the Court, an amount that is 110% of what this Court awarded Stanford. Courts in this Circuit have deemed 110% of the judgment amount

to be adequate for a supersedeas. *See, e.g., Celador Int'l Ltd. v. Walt Disney Co.*, 04-cv-3541, 2011 WL 13187262, at \*4 (C.D. Cal. Aug. 5, 2011); *Acacia Research Corp. v. Nat'l Union Fire Ins. Co.*, 05-cv-501, 2008 WL 4381649, at \* 2 (C.D. Cal. Sept. 9, 2008).


4. This Court's website makes clear that, prior to tendering a supersedeas bond, Veritas must move for and obtain an order granting the bond. *See* How to E-File a Surety bond, <https://www.wawd.uscourts.gov/sites/wawd/files/FilingASuretyBond.pdf>.

5. Veritas's counsel has conferred with Stanford's counsel and Stanford's counsel has informed Veritas's counsel that Stanford does not plan to oppose this motion.

For the foregoing reasons, Veritas moves this Court for an order: (1) approving a supersedeas bond amount of \$164,556.59 in this matter; and (2) stating that, upon Veritas's payment of \$164,556.59 into the Registry of the Court, the Court will stay execution of the fee award judgment (ECF No. 71) pending disposition of Veritas's appeal.

Dated: August 24, 2022

Respectfully Submitted,

  
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